UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

ELECTRONIC MAIL

May 31, 2013

Mr. Derek W. Tomlinson, P.E., P. Eng.
Project Coordinator
Geosyntec Consultants, Inc.
1787 Sentry Parkway West
Building 18, Suite 120
Blue Bell, PA 19422

RE: North Penn 5 Superfund Site, Operable Unit 2
Preliminary (30%) Design Submittal/Pre-Design Investigation Work Plan (30% Design), dated March 18, 2013, as required by Administrative Order
(Docket No. CERCLA-03-2012-0205DC)

Dear Mr. Tomlinson:

The U.S. Environmental Protection Agency (EPA) has received and reviewed the subject document, as well as the electronic redline versions provided on May 15, 2013 (Quapp) and May 24, 2013 (rest of the document). The 30% Design is approved provided that the attached comments are addressed sufficiently in a final version of the document. According to Paragraph 25.c.3, "Upon approval by EPA, the RA Work Plan shall be deemed to be incorporated into this Order and made enforceable part hereof."

Please submit the final Preliminary (30%) Design within fourteen (14) days of the date of this letter per Paragraph 67 of this Order. To expedite review of the revised document, please submit responses to our comments and a revised redlined electronic version of the RDWP along with the revised final RDWP.

If you have any questions, please contact me at 215-814-3018.

Sincerely,

Sharon Fang, P.E.
Remedial Project Manager

Attachment
cc: Tim Cherry, PADEP
Ex. 4 - CBI, HGL
Allison Gardner, EPA
File

Comments on NP5, OU2 30% design
for incorporation into the final document

1. **Figure 2.** Provide a revised Figure 2 with a label on the West Branch of the Neshaminy Creek.

2. **Figure 7, dated May 2013,** does not indicate the location of Wells RI28 through RI31. Please provide a revised Figure 7.

3. **Identify wells to be surveyed** "as part of OU2" by either listing them in the text or including them on a figure and referenced the figure in the text. Wells to be surveyed are the temporary and existing overburden and bedrock wells in the vicinity of the OU2 overburden delineation.

4. **Section 5.4.7 and Section 5.4.8.** Add language to explain the decision criteria in the event the location is dry, e.g. if the location is dry, the location will be relocated 10 yards closer to the centerline of the trough and redrilled, or if the location is dry and within 50 yards of another sampling location that has water to be sampled, the location will be noted "dry."

5. **Section 7.** Include language that PE samples will be analyzed and results provided.

6. **Standard Operating Procedures (SOPs).** The revised document has improved with regard to project specifics in the SOPs; however, the following should be addressed for the well installation SOP:
    - The text indicates that wells will be installed, "with limited grouting above the pre-packed well screen." Please make the document more specific as to what this means.
    - The text does not indicate how long the driller must wait before developing the temporary wells. It is customary to allow 24 to 48 hours after installation before development is started. Please modify the text to indicate that this practice will be followed.

7. **Spill Prevention Control and Countermeasures (SPCC) Plan** – The SPCC Plan that is now included as Section 4.4.2 is an improvement over the previous version. However, the following would enhance the clarity and coverage of the document:
    - In the second sentence of the introductory paragraph, the phrase, "discharge of oil to nearby water sources" should be changed to "discharge of site contaminants to the surrounding soil and/or groundwater."
    - Please add the following sentence after the first sentence of the third bullet of "Operating Procedures to Prevent a Pollutant Spill": The transfer of groundwater from the sampling pump to the sample containers will be conducted over a 5-gallon bucket, which will be used to capture any spills/overflow.

- Add another bullet to "Operating Procedures to Prevent a Pollutant Spill" detailing how the spill of liquids during purging and development activities will be prevented. Simply stating that the spilled groundwater will infiltrate back into the ground is insufficient.
- Replace the second sentence of the second bullet in "Control Measures Installed to Prevent Pollutant from Entering Navigable Waters" with, "Spilled liquid IDW will be pumped or otherwise transferred into a 55-gallon drum specified for liquid IDW disposal. Any impacted soils will be collected and placed into a 55-gallon drum specified for solid IDW disposal."
- Replace the third sentence of the second bullet in "Control Measures Installed to Prevent Pollutant from Entering Navigable Waters" with, "Spilled soil IDW will be transferred into a 55-gallon drum specified for solid IDW disposal."
- Delete the second bullet under Countermeasures to Contain, Cleanup, and Mitigate the Effects of a Pollutant Spill that has an Impact on Navigable Waters.
- List the National Response Center phone number (1-800-424-8802) in the text and state criteria to perform written and verbal notification using information (from Page 8 from the original SPCC) in the event of a discharge.

8. **Quapp.** Suggest future Quapps follow UFPP format.

9. **Quapp, Section 3.5.3.3** – Laboratory control sample (LCS) duplicates are not an analytical requirement for the project methods; it should be acknowledged that LCS duplicate results may not always be available. Revise the sentence to: "LCS duplicate (LCSD) analyses are not method requirements; however, laboratories often include LCSD data. If the laboratory has performed an LCSD, these results can be compared to the LCS results to determine analytical precision for a specific test if an MS/MSD pair is not available."